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January 4, 2022

VIA ECF

Honorable Stewart D. Aaron United States Magistrate Judge Southern District of New York 500 Pearl St. New York, NY 10007-1312 Request GRANTED. SO ORDERED.

Dated: January 4, 2022

Att co an

Re: Ortiz v. Commissioner of Social Security, Civil Action No. 1:21-cv-01042-SDA

Dear Judge Aaron,

We write on behalf of plaintiff, Julissa Acosta Ortiz, and with the consent of the defendant, to request a 21-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on January 6, 2022. Plaintiff respectfully requests an extension of time up to and including January 27, 2022. This is plaintiff's third request for an extension.

While counsel had every expectation of meeting the January 6, 2022 deadline, the additional time is necessary because the attorney working on the brief just tested positive for COVID, one day after her husband tested positive. Both parents are experiencing mild symptoms and both of their young children also contracted COVID within the last three days. We also are a small office and have 18 other cases with opening and reply briefs due during the month of January.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

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- a. Plaintiff to file her motion for judgment on the pleadings on or before January 27, 2022;
- b. Defendant to file its response/cross-motion on or before **March 28**, **2022**; and
- c. Plaintiff to file her reply (if any) on or before April 18, 2022.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

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cc: Graham Morrison, Esq. (by ECF)